



United States Attorney  
Southern District of New York

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October 22, 2021

MEMO ENDORSED

BY ECF

The Honorable Lewis A. Kaplan  
United States District Court  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Ofer Abarbanel, 21 Cr. 532 (LAK)*

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 10/22/21

Dear Judge Kaplan:

The Government respectfully requests an extension of the discovery deadlines in this case. At arraignment, the Court ordered the Government to complete the production of discovery by October 22, 2021. Since that time, the Government has made three discovery productions consisting primarily of search warrants, phone and iCloud account returns, subscriber records, banking and financial records, emails and correspondence, and the full extraction reports of a cellphone and three laptops belonging to the defendant. The fourth production, which will encompass the balance of the discoverable materials of which the Government is presently aware and which are in the Government's custody and control, consists primarily of documents obtained from the SEC and emails obtained pursuant to search warrants. That production is fully prepared, but due to its size will require significant time to process, download, and copy.

Accordingly, the Government requests a three-week extension of the Court's discovery deadline in order to download and transmit the fourth production to defense counsel. Defense counsel does not object to this request. The Government has conferred with defense counsel and recognizes that an extension of the discovery deadline, as well as the overall size of the discovery, may warrant further conversation about the applicable deadlines and schedule in this case.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: /s/  
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Southern District of New York  
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Cc: Glen McGorty, Esq.,  
Rebecca Ricigliano, Esq.  
Counsel to Ofer Aberbanel (by ECF)

*Granted*  
SO ORDERED  
*Lewis A. Kaplan*  
LEWIS A. KAPLAN, USDI

*10/22/21*